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February 2, 2023

**VIA ECF**

Honorable Jennifer E. Willis, U.S.M.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Franco v. 380 Second LLC, et al.*  
Case No. 1:22-cv-04011-PAE-JW

Dear Judge Willis:

This firm represents Defendant 380 Second LLC in connection with the above-referenced matter. In light of the discovery and amendment of pleadings issues raised in recent correspondence filed with the Court (Dkt. Nos. 33, 35), and in light of the upcoming close of fact discovery deadline of February 6, 2023, the parties jointly request that a status conference be scheduled with the Court to discuss a proposed extension of the fact discovery deadline. This is the first request for a conference to address a proposed extension of deadlines.

We appreciate Your Honor's consideration of this request, and thank the Court for its time and attention to this matter.

Respectfully,

/s Sean J. Kirby

Sean J. Kirby  
for SHEPPARD MULLIN RICHTER & HAMPTON  
LLP

cc: Counsel of Record, via ECF